

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

A.B.S., as surviving daughter of deceased)
ANTHONY L. SMITH, and a minor, by)
and through her next friend CHRISTINA)
WILSON,)

Plaintiff,)

Case No.: 4:12-cv-00202-JCH

v.)

BOARD OF POLICE COMMISSIONERS,)
Et al.,)

Defendants.)

**PLAINTIFF A.B.S.'S CONSENT MOTION FOR EXTENSION OF TIME AND
MODIFICATION OF SCHEDULING ORDER**

COMES NOW Plaintiff, by and through her undersigned counsel, and for her Consent Motion For Extension of Time and Modification of Scheduling Order states to the Court as follows:

1. The Parties participated in mediation of this matter on October 3, 2018 and again on October 10, 2018. While the mediation did not result in a finalized settlement, the parties believe they are making progress toward that objective and will know whether their efforts have been productive by the close of business on Monday, October 15, 2018.

2. The Court's current ADR Referral terminates on October 10, 2018, with a report date of October 11, 2018.

3. While the Parties will not require another in-person session with the mediator, the Parties believe the progress they have made is, in large part, a product of the efforts of mediator Hon. Stephen Limbaugh.

4. Accordingly, the Parties request an extension of the ADR Referral up to an including October 15, 2018, with the ADR Compliance Report due to the Court on or after October 16, 2018.

5. This Motion is not made for the purpose of delay or any other improper purpose and granting this Motion will not unduly prejudice any party.

WHEREFORE Plaintiff prays this Honorable Court grant Plaintiff's Motion for Extension of Time consistent with the requests set forth above and for such other and further relief as the Court may deem just and proper under the circumstances.

KODNER WATKINS, LC

/s/ Michael D. Schwade

By: ALBERT S. WATKINS, LC #34553MO

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

Signature above is certification that on this the 11th day of October, 2018 a true and correct copy of the foregoing document was filed electronically using the CM/ECF System which will cause a copy to be served upon all counsel of record.